

March 8, 2018

The Honorable Ajit Pai, Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Dear Chairman Pai:

We write this letter to express our serious concerns that the map released by the Federal Communications Commission last week showing presumptive eligible areas for Mobility Fund Phase II (MF II) support may not be an accurate depiction of areas in need of universal service support. We understand that the map was developed based on a preliminary assessment from a one-time data collection effort that will be verified through a challenge process. However, we are concerned that the map misrepresents the existence of 4G LTE services in many areas. As a result, the Commission's proposed challenge process may not be robust enough to adequately address the shortcomings in the Commission's assessment of geographic areas in need of support for this proceeding.

MF II is intended to provide \$4.53 billion in support over 10 years to preserve and expand mobile coverage to rural areas. These resources will be made available to provide 4G LTE service where it is not economically viable today to deploy services through private sector means alone. Having consistently traveled throughout rural areas in our states, it appears that there are significant gaps in mobile coverage beyond what is represented by the map's initial presentation of "eligible areas". To accurately target support to communities truly in need of broadband service, it is critical we collect standardized and accurate data.

For too long, millions of rural Americans have been living without consistent and reliable mobile broadband service. Identifying rural areas as not eligible for support will exacerbate the digital divide, denying fundamental economic opportunities to these rural communities. We strongly urge the Commission to accurately and consistently identify areas that do not have unsubsidized 4G LTE service and provide Congress with an update on final eligible areas before auctioning \$4.53 billion of MF II support.

We appreciate your immediate attention to this matter.

Sincerely,



Roger F. Wicker
United States Senator



Margaret Wood Hassan
United States Senator



Cory Gardner
United States Senator



Angus King
United States Senator



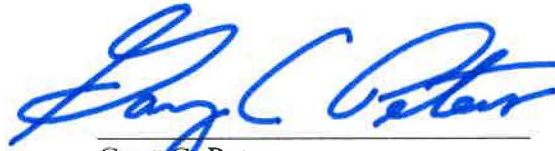
Jerry Moran
United States Senator



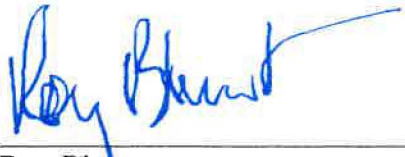
Amy Klobuchar
United States Senator



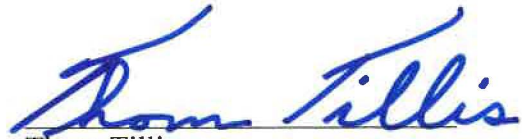
Pat Roberts
United States Senator



Gary C. Peters
United States Senator



Roy Blunt
United States Senator



Thom Tillis
United States Senator



FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

OFFICE OF
THE CHAIRMAN

March 28, 2018

The Honorable Roger Wicker
United States Senate
555 Dirksen Senate Office Building
Washington, D.C. 20510

Dear Senator Wicker:

Thank you for your letter regarding the Mobility Fund II (MF-II) initial eligible areas map that was publicly released on February 27, 2018. In 2011, the previous FCC unanimously decided to phase down legacy high-cost support for mobile providers and redirect our limited Universal Service Funds (USF) to the unserved and underserved areas that need it the most. In February 2017, the Commission unanimously decided to allocate up to \$4.53 billion to provide ongoing support over the next 10 years to those primarily rural areas that lack unsubsidized 4G LTE service. And in August 2017, the Commission unanimously adopted a framework for a challenge process to determine the areas that would be eligible for support in the MF-II auction. This challenge process is based upon lessons learned from the Connect America Fund and Mobility Fund I, and starts with the most standardized and granular mobile coverage data the Commission has ever collected from providers. We recognize, however, that providers submit projections of coverage, and that the provider coverage data therefore is (and should be) subject to challenge based upon actual, on the ground speed tests.

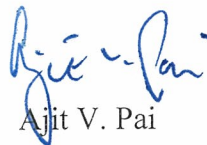
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Specifically, starting tomorrow, there will be a seven-month-long challenge process which tests providers' projections against actual observations. During the first step of this process, interested parties will have the opportunity to test the accuracy of the coverage maps by submitting speed tests to the USAC challenge portal. In order to assist those interested in submitting challenges, the Commission will soon be releasing a map of those areas that did not make the initial eligibility map because only one unsubsidized carrier claims to provide the requisite level of service. These are the areas that are most susceptible of being successfully challenged. This is a major advantage: participating entities will be able to prioritize their efforts and target very specific areas. Speaking of participation, in April and May, FCC staff will hold multiple events online and in different regions of the country designed to help state, local, and Tribal governmental entities get involved in the challenge process.

Once the deadline for challenges has passed, providers will have the opportunity to rebut these speed tests and Commission staff will adjudicate these challenges. After this extensive process, the Commission will release a final map of areas eligible for support in the MF-II auction.

Like you, the FCC is focused on ensuring that our limited funds are effectively and accurately targeted to areas that lack unsubsidized 4G LTE service. This is a vital part of our strategy toward closing the wireless dimension of the digital divide. Indeed, that is why the Mobility Fund Phase II auction was conceived by a united Commission 2,344 days ago and why the current Commission was united in moving forward in this manner. Commencing the auction will deliver connectivity to many Americans who've already waited too long for it. I appreciate your interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,

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Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

OFFICE OF
THE CHAIRMAN

March 28, 2018

The Honorable Maggie Hassan
United States Senate
B85 Russell Senate Office Building
Washington, D.C. 20510

Dear Senator Hassan:

Thank you for your letter regarding the Mobility Fund II (MF-II) initial eligible areas map that was publicly released on February 27, 2018. In 2011, the previous FCC unanimously decided to phase down legacy high-cost support for mobile providers and redirect our limited Universal Service Funds (USF) to the unserved and underserved areas that need it the most. In February 2017, the Commission unanimously decided to allocate up to \$4.53 billion to provide ongoing support over the next 10 years to those primarily rural areas that lack unsubsidized 4G LTE service. And in August 2017, the Commission unanimously adopted a framework for a challenge process to determine the areas that would be eligible for support in the MF-II auction. This challenge process is based upon lessons learned from the Connect America Fund and Mobility Fund I, and starts with the most standardized and granular mobile coverage data the Commission has ever collected from providers. We recognize, however, that providers submit projections of coverage, and that the provider coverage data therefore is (and should be) subject to challenge based upon actual, on the ground speed tests.

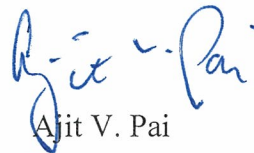
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Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

OFFICE OF
THE CHAIRMAN

March 28, 2018

The Honorable Cory Gardner
United States Senate
354 Russell Senate Office Building
Washington, D.C. 20510

Dear Senator Gardner:

Thank you for your letter regarding the Mobility Fund II (MF-II) initial eligible areas map that was publicly released on February 27, 2018. In 2011, the previous FCC unanimously decided to phase down legacy high-cost support for mobile providers and redirect our limited Universal Service Funds (USF) to the unserved and underserved areas that need it the most. In February 2017, the Commission unanimously decided to allocate up to \$4.53 billion to provide ongoing support over the next 10 years to those primarily rural areas that lack unsubsidized 4G LTE service. And in August 2017, the Commission unanimously adopted a framework for a challenge process to determine the areas that would be eligible for support in the MF-II auction. This challenge process is based upon lessons learned from the Connect America Fund and Mobility Fund I, and starts with the most standardized and granular mobile coverage data the Commission has ever collected from providers. We recognize, however, that providers submit projections of coverage, and that the provider coverage data therefore is (and should be) subject to challenge based upon actual, on the ground speed tests.

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Ajit V. Pai

P.S. Hope all is well with you and the family!
Sorry the Broncos missed out on Kirk Cousins
(well, not really sorry, but hey - this Chiefs
ban is at least trying).



FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

March 28, 2018

OFFICE OF
THE CHAIRMAN

The Honorable Jerry Moran
United States Senate
521 Dirksen Senate Office Building
Washington, D.C. 20510

Dear Senator Moran:

Thank you for your letter regarding the Mobility Fund II (MF-II) initial eligible areas map that was publicly released on February 27, 2018. In 2011, the previous FCC unanimously decided to phase down legacy high-cost support for mobile providers and redirect our limited Universal Service Funds (USF) to the unserved and underserved areas that need it the most. In February 2017, the Commission unanimously decided to allocate up to \$4.53 billion to provide ongoing support over the next 10 years to those primarily rural areas that lack unsubsidized 4G LTE service. And in August 2017, the Commission unanimously adopted a framework for a challenge process to determine the areas that would be eligible for support in the MF-II auction. This challenge process is based upon lessons learned from the Connect America Fund and Mobility Fund I, and starts with the most standardized and granular mobile coverage data the Commission has ever collected from providers. We recognize, however, that providers submit projections of coverage, and that the provider coverage data therefore is (and should be) subject to challenge based upon actual, on the ground speed tests.

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Ajit V. Pai

P.S. Hope all's well, Senator! With any luck, the next time we see each other, we'll be toasting a KU championship! #RockChalk



FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

OFFICE OF
THE CHAIRMAN

March 28, 2018

The Honorable Pat Roberts
United States Senate
109 Hart Senate Office Building
Washington, D.C. 20510

Dear Senator Roberts:

Thank you for your letter regarding the Mobility Fund II (MF-II) initial eligible areas map that was publicly released on February 27, 2018. In 2011, the previous FCC unanimously decided to phase down legacy high-cost support for mobile providers and redirect our limited Universal Service Funds (USF) to the unserved and underserved areas that need it the most. In February 2017, the Commission unanimously decided to allocate up to \$4.53 billion to provide ongoing support over the next 10 years to those primarily rural areas that lack unsubsidized 4G LTE service. And in August 2017, the Commission unanimously adopted a framework for a challenge process to determine the areas that would be eligible for support in the MF-II auction. This challenge process is based upon lessons learned from the Connect America Fund and Mobility Fund I, and starts with the most standardized and granular mobile coverage data the Commission has ever collected from providers. We recognize, however, that providers submit projections of coverage, and that the provider coverage data therefore is (and should be) subject to challenge based upon actual, on the ground speed tests.

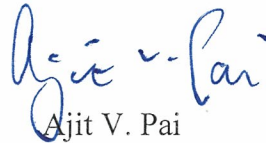
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Sincerely,

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Ajit V. Pai

P.S. Senator, hope all's well with you - and congratulations on your newest grandchild!



FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

OFFICE OF
THE CHAIRMAN

March 28, 2018

The Honorable Angus King
United States Senate
133 Hart Senate Office Building
Washington, D.C. 20510

Dear Senator King:

Thank you for your letter regarding the Mobility Fund II (MF-II) initial eligible areas map that was publicly released on February 27, 2018. In 2011, the previous FCC unanimously decided to phase down legacy high-cost support for mobile providers and redirect our limited Universal Service Funds (USF) to the unserved and underserved areas that need it the most. In February 2017, the Commission unanimously decided to allocate up to \$4.53 billion to provide ongoing support over the next 10 years to those primarily rural areas that lack unsubsidized 4G LTE service. And in August 2017, the Commission unanimously adopted a framework for a challenge process to determine the areas that would be eligible for support in the MF-II auction. This challenge process is based upon lessons learned from the Connect America Fund and Mobility Fund I, and starts with the most standardized and granular mobile coverage data the Commission has ever collected from providers. We recognize, however, that providers submit projections of coverage, and that the provider coverage data therefore is (and should be) subject to challenge based upon actual, on the ground speed tests.

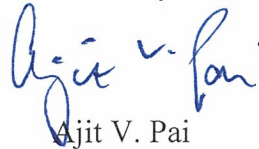
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Sincerely,

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Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

OFFICE OF
THE CHAIRMAN

March 28, 2018

The Honorable Amy Klobuchar
United States Senate
302 Hart Senate Office Building
Washington, D.C. 20510

Dear Senator Klobuchar:

Thank you for your letter regarding the Mobility Fund II (MF-II) initial eligible areas map that was publicly released on February 27, 2018. In 2011, the previous FCC unanimously decided to phase down legacy high-cost support for mobile providers and redirect our limited Universal Service Funds (USF) to the unserved and underserved areas that need it the most. In February 2017, the Commission unanimously decided to allocate up to \$4.53 billion to provide ongoing support over the next 10 years to those primarily rural areas that lack unsubsidized 4G LTE service. And in August 2017, the Commission unanimously adopted a framework for a challenge process to determine the areas that would be eligible for support in the MF-II auction. This challenge process is based upon lessons learned from the Connect America Fund and Mobility Fund I, and starts with the most standardized and granular mobile coverage data the Commission has ever collected from providers. We recognize, however, that providers submit projections of coverage, and that the provider coverage data therefore is (and should be) subject to challenge based upon actual, on the ground speed tests.

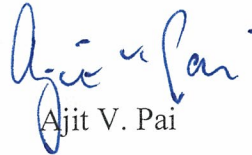
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Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

OFFICE OF
THE CHAIRMAN

March 28, 2018

The Honorable Gary Peters
United States Senate
724 Hart Senate Office Building
Washington, D.C. 20510

Dear Senator Peters:

Thank you for your letter regarding the Mobility Fund II (MF-II) initial eligible areas map that was publicly released on February 27, 2018. In 2011, the previous FCC unanimously decided to phase down legacy high-cost support for mobile providers and redirect our limited Universal Service Funds (USF) to the unserved and underserved areas that need it the most. In February 2017, the Commission unanimously decided to allocate up to \$4.53 billion to provide ongoing support over the next 10 years to those primarily rural areas that lack unsubsidized 4G LTE service. And in August 2017, the Commission unanimously adopted a framework for a challenge process to determine the areas that would be eligible for support in the MF-II auction. This challenge process is based upon lessons learned from the Connect America Fund and Mobility Fund I, and starts with the most standardized and granular mobile coverage data the Commission has ever collected from providers. We recognize, however, that providers submit projections of coverage, and that the provider coverage data therefore is (and should be) subject to challenge based upon actual, on the ground speed tests.

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Sincerely,



Ajit V. Pai

P.S. Senator, I hope all's well with you and your wife! My better half sends her regards. Also, is there any chance I could snag five minutes of your time regarding an issue in the U.P.?



FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

OFFICE OF
THE CHAIRMAN

March 28, 2018

The Honorable Roy Blunt
United States Senate
260 Russell Senate Office Building
Washington, D.C. 20510

Dear Senator Blunt:

Thank you for your letter regarding the Mobility Fund II (MF-II) initial eligible areas map that was publicly released on February 27, 2018. In 2011, the previous FCC unanimously decided to phase down legacy high-cost support for mobile providers and redirect our limited Universal Service Funds (USF) to the unserved and underserved areas that need it the most. In February 2017, the Commission unanimously decided to allocate up to \$4.53 billion to provide ongoing support over the next 10 years to those primarily rural areas that lack unsubsidized 4G LTE service. And in August 2017, the Commission unanimously adopted a framework for a challenge process to determine the areas that would be eligible for support in the MF-II auction. This challenge process is based upon lessons learned from the Connect America Fund and Mobility Fund I, and starts with the most standardized and granular mobile coverage data the Commission has ever collected from providers. We recognize, however, that providers submit projections of coverage, and that the provider coverage data therefore is (and should be) subject to challenge based upon actual, on the ground speed tests.

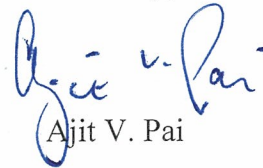
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Specifically, starting tomorrow, there will be a seven-month-long challenge process which tests providers' projections against actual observations. During the first step of this process, interested parties will have the opportunity to test the accuracy of the coverage maps by submitting speed tests to the USAC challenge portal. In order to assist those interested in submitting challenges, the Commission will soon be releasing a map of those areas that did not make the initial eligibility map because only one unsubsidized carrier claims to provide the requisite level of service. These are the areas that are most susceptible of being successfully challenged. This is a major advantage: participating entities will be able to prioritize their efforts and target very specific areas. Speaking of participation, in April and May, FCC staff will hold multiple events online and in different regions of the country designed to help state, local, and Tribal governmental entities get involved in the challenge process.

Once the deadline for challenges has passed, providers will have the opportunity to rebut these speed tests and Commission staff will adjudicate these challenges. After this extensive process, the Commission will release a final map of areas eligible for support in the MF-II auction.

Like you, the FCC is focused on ensuring that our limited funds are effectively and accurately targeted to areas that lack unsubsidized 4G LTE service. This is a vital part of our strategy toward closing the wireless dimension of the digital divide. Indeed, that is why the Mobility Fund Phase II auction was conceived by a united Commission 2,344 days ago and why the current Commission was united in moving forward in this manner. Commencing the auction will deliver connectivity to many Americans who've already waited too long for it. I appreciate your interest in this matter. Please let me know if I can be of any further assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ajit V. Pai". The signature is stylized with a large initial "A" and a long horizontal stroke.

Ajit V. Pai



FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON

OFFICE OF
THE CHAIRMAN

March 28, 2018

The Honorable Thom Tillis
United States Senate
185 Dirksen Senate Office Building
Washington, D.C. 20510

Dear Senator Tillis:

Thank you for your letter regarding the Mobility Fund II (MF-II) initial eligible areas map that was publicly released on February 27, 2018. In 2011, the previous FCC unanimously decided to phase down legacy high-cost support for mobile providers and redirect our limited Universal Service Funds (USF) to the unserved and underserved areas that need it the most. In February 2017, the Commission unanimously decided to allocate up to \$4.53 billion to provide ongoing support over the next 10 years to those primarily rural areas that lack unsubsidized 4G LTE service. And in August 2017, the Commission unanimously adopted a framework for a challenge process to determine the areas that would be eligible for support in the MF-II auction. This challenge process is based upon lessons learned from the Connect America Fund and Mobility Fund I, and starts with the most standardized and granular mobile coverage data the Commission has ever collected from providers. We recognize, however, that providers submit projections of coverage, and that the provider coverage data therefore is (and should be) subject to challenge based upon actual, on the ground speed tests.

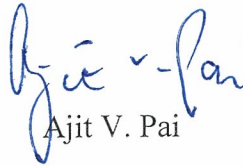
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